

CAUSE NO. H-07-0171

**NORA SOTO GUTIERREZ,
PLAINTIFF**

v.

**SUSAN EISENER HIATT,
SYLVIA R. GARCIA and
PATRICE BARRON,
DEFENDANTS**

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IN THE UNITED STATES

DISTRICT COURT

HOUSTON DIVISION

**UNITED STATES COURTS
SOUTHERN DISTRICT OF TEXAS
FILED**

APR 30 2007

MICHAEL N. MILBY, CLERK OF COURT

**DEFENDANT, PATRICE BARRON'S ANSWER
TO PLAINTIFF'S ORIGINAL PETITION**

TO THE HONORABLE JUDGE OF SAID COURT:

Defendant, Patrice Barron provides the following answer.

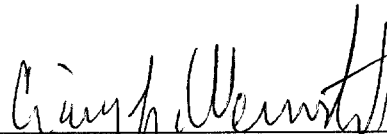
1. Defendant denies the allegations in Paragraph 1 of Plaintiff's Complaint.
2. Defendant denies the allegations in Paragraph 2 of Plaintiff's Complaint.
3. Defendant denies all other allegations in Plaintiff's Complaint.

AFFIRMATIVE DEFENSES

1. Plaintiff's claims are barred by collateral estoppel.
2. Plaintiff's claims are barred by res judicata.
3. Plaintiff's claims are barred by waiver.
4. Plaintiff's claims are barred by estoppel.
5. Plaintiff's claims are barred by the applicable statute of limitations.
6. Plaintiff's Complaint fails to state a cause of action and should be dismissed pursuant to Rule (12)(b)(6).

WHEREFORE PREMISES CONSIDERED, Defendant prays that this Court enter judgment in her favor and for such other and further relief to which she may be entitled.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Craig L. Weinstock", is written over a horizontal line.

Craig L. Weinstock
State Bar No. 21097300
Southern District of Texas No. 4424
3400 JPMorgan Chase Tower
600 Travis
Houston, Texas 77002
(713) 226-1200
(713) 223-3717 (Facsimile)

ATTORNEY FOR DEFENDANT,
PATRICE BARRON

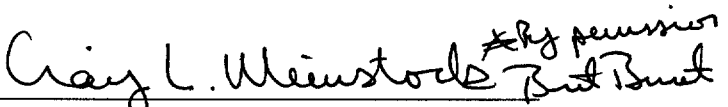
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant, Patrice Barron's Answer to Plaintiff's Original Petition was served this 30th day of April, 2007 to all known parties of record:

VIA E-MAIL and CERTIFIED MAIL
RETURN RECEIPT REQUESTED

7100 2039 1541 0009 6310

Nora Soto Gutierrez
5030 Kasper Street
Corpus Christi, Texas 78415
ngharrah@yahoo.com


Craig L. Weinstock

**By permission
But But
#00796198*

LOCKE LIDDELL & SAPP LLP

ATTORNEYS & COUNSELORS

3400 JPMORGAN CHASE TOWER

600 TRAVIS STREET

HOUSTON, TEXAS 77002-3095

AUSTIN • DALLAS • HOUSTON • NEW ORLEANS • WASHINGTON, D.C.

(713) 226-1200

Fax: (713) 223-3717

www.lockeliddell.com

Direct Number: (713) 226-1320
email: cweinstock@lockeliddell.com

April 30, 2007

**UNITED STATES COURTS
SOUTHERN DISTRICT OF TEXAS
FILED**

APR 30 2007

Michael H. Milby, Clerk
United States District Court
515 Rusk Avenue
Houston, Texas 77002

MICHAEL N. MILBY, CLERK OF COURT

Re: Cause No. H-07-0171; Nora Soto Gutierrez v. Susan Eisener Hiatt, Sylvia R.
Garcia and Patrice Barron; In the United States District Court, Houston Division

Dear Mr. Milby:

Enclosed for filing among the papers of the above-captioned cause is the original and two copies of Defendant Patrice Barron's Answer to Plaintiff's Original Petition.

Very truly yours,



Craig L. Weinstock

CLW/cjg
Enclosure

cc: **VIA E-MAIL and CERTIFIED MAIL**
RETURN RECEIPT REQUESTED
Nora Soto Gutierrez
5030 Kasper Street
Corpus Christi, Texas 78415
ngharrah@yahoo.com

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